

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Jane Doe 1, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

Deutsche Bank Aktiengesellschaft, et. al.,

Defendants.

Case No. 1:22-CV-10018 (JSR)

**DECLARATION OF SIGRID S. MCCAWLEY IN SUPPORT OF
MOTION FOR AN AWARD OF ATTORNEYS' FEES AND EXPENSES**

I, Sigrid S. McCawley, declare as follows:

1. I am a member in good standing of the bar of the State of New York and am admitted to practice before this Court. I am a Managing Partner of Boies Schiller Flexner LLP ("BSF" or the "Firm"). I make this declaration on my own personal knowledge, and if called as a witness to testify, I could and would testify competently to the following facts.

2. I am submitting this declaration in support of my Firm's application for an award of attorneys' fees, expenses, and charges ("expenses") in connection with services rendered in the above-entitled action (the "Litigation").

3. BSF is Class Counsel of record for the Class certified for settlement purposes and Class Representative Jane Doe 1 ("Class Representative").

5. BSF has a strong record of successfully and diligently representing plaintiffs in complex class action litigation. Recent cases in which BSF or its partners were lead or co-Class Counsel include: *In re Grupo Televisa Securities Litigation*, No 18-cv-01979 (S.D.N.Y.), a

securities fraud class action in which the firm achieved a favorable \$95 million settlement; *In re Blue Cross Blue Shield Antitrust Litigation*, No. 13-cv-20000 (N.D. Ala.), an antitrust class action in which the Firm achieved both what the court referred to as “historic” injunctive relief and a \$2.7 billion award in a settlement that received final approval in August 2022; *In re Takata Airbag Products Liability Litigation*, No. 15-md-2599 (S.D. Fla.), a products liability class action which is still proceeding against certain defendants, but in which the Firm has already obtained a recovery of more than \$1.5 billion; and *In re Halliburton Securities Litigation*, No. 02-cv-1152 (N.D. Tex.), in which the Firm prevailed in a long-running securities action that involved two successful appeals to the United States Supreme Court before achieving a \$100 million recovery for the class. Another notable case in which BSF or its partners were Class Counsel is *In re Auction House Antitrust Litigation*, No. 00-cv-648 (S.D.N.Y.), in which the Firm won \$512 million in an antitrust class action after prior interim Class Counsel valued the case at less than \$100 million.

4. The information in this declaration regarding BSF’s time and expenses is taken from time and expense reports and supporting documentation prepared and maintained by the Firm in the ordinary course of business. I am the partner who oversaw and conducted the day-to-day activities in the Litigation and I reviewed these reports (and backup documentation where necessary or appropriate) in connection with the preparation of this declaration. The purpose of this review was to confirm both the accuracy of the entries on the printouts as well as the necessity for, and reasonableness of, the time and expenses committed to the Litigation. As a result of this review, timekeepers who billed less than 15 hours were excluded from the Firm’s lodestar calculations due to their nominal contributions to the successful resolution of the Litigation. Based on this review, I believe that the time reflected in the Firm’s lodestar calculation and the expenses

for which payment is sought herein are reasonable and were necessary for the effective and efficient prosecution and resolution of the Litigation.

5. Accounting for the reductions referred to above, the number of hours spent on the Litigation by the Firm is 5,545.5. The lodestar amount for attorney/paraprofessional time based on the Firm's 2023 rates is \$4,825,927. A breakdown of the lodestar is provided below:

Name	Position	Hours	Rate	Lodestar
David Boies	Partner	495.1	\$2,110	\$1,044,661
Sigrid McCawley	Partner	669.5	\$1,230	\$823,485
Andrew Villacastin	Partner	349.8	\$1,080	\$377,784
Alexander Boies	Counsel	587.7	\$940	\$552,438
Sabina Mariella	Associate	264.3	\$860	\$227,298
Daniel Crispino	Associate	615.2	\$860	\$529,072
Alexander Law	Associate	404.4	\$710	\$287,124
Virginia Su	Associate	141.5	\$670	\$94,805
Joshua Kolb	Associate	33.3	\$670	\$22,311
Thomas McCawley	Staff Attorney	257.7	\$500	\$128,850
Adrianna Mathew	Staff Attorney	327.1	\$430	\$140,653
Michael Urban	Staff Attorney	380.6	\$430	\$163,658
Trevor Degre	Staff Attorney	257.3	\$430	\$110,639
Dylan Cruthers	Staff Attorney	190.2	\$500	\$95,100
James Sliter	Staff Attorney	59.9	\$430	\$25,757
Richard Williams	Staff Attorney	42.4	\$430	\$18,232
Michael Koes	Staff Attorney	41.1	\$430	\$17,673
Amanda Hunter	Staff Attorney	35.5	\$430	\$15,265
Kaylen Dayter	Staff Attorney	32.8	\$430	\$14,104
Anna Christian	Staff Attorney	31.9	\$430	\$13,717

Name	Position	Hours	Rate	Lodestar
Onchan Inkhamfong	Staff Attorney	29	\$430	\$12,470
Connor Gilgallon	Staff Attorney	25.5	\$430	\$10,965
John Bannister	Staff Attorney	38.7	\$430	\$16,641
Olivia McKenzie	Paralegal	165.5	\$350	\$57,925
Shari Ginsberg	Managing Clerk	32.5	\$380	\$12,350
Christopher Arborn	Legal Assistant	37.0	\$350	\$12,950

6. The hourly rates shown above are the Firm's regular 2023 rates.¹ These hourly rates are consistent with the hourly rates the Firm bills to clients when litigating in state and federal courts during 2023. The Firm's rates are set based on periodic analysis of rates charged by firms performing comparable work on both the plaintiff side and defense side.

7. The Firm seeks an award of \$587,755.56 in expenses in connection with the prosecution of the Litigation. The categories and amounts of those expenses are:

Firm Expenses and Charges	
Expense Category	Amount
Transportation, Travel, and Meals	\$18,321.83
Messenger/Delivery Services	\$162.36
Telephone/Teleconference	\$368.50
Computer Research	\$28,047.93
Court Costs	\$1,024.25
Transcript Expenses	\$44,078.05
Document Reproduction	\$4,430.72
eDiscovery Databases	\$133,689.42
Consultants/Experts	\$357,632.50
Total	\$587,755.56

¹ For personnel who are no longer employed by the Firm, the "current rate" used for the lodestar calculation is based upon the rate for that person in his or her final year of employment with the Firm.

8. The expenses for which the Firm seeks compensation are:
- a. **Transportation, Travel, and Meals:** \$18,286.14. In connection with the prosecution of this case, the Firm has paid for travel and related expenses to, among other things, attend court hearings, meet with witnesses, mediators and opposing counsel, and take or defend depositions.
 - b. **Messenger/Delivery Services:** \$162.36. The Firm utilized overnight couriers and other messenger services (where necessary) to transmit hard-copy versions of various documents to attorneys, experts, and the Court.
 - c. **Telephone/Teleconference:** \$368.50. These charges relate to the extensive and repeated teleconferences Class Counsel held among its attorneys, co-counsel, and opposing counsel concerning various aspects of the Litigation.
 - d. **Computer Research:** \$28,047.93. This category includes vendors such as LexisNexis and Westlaw. These resources were primarily used to obtain access to legal research. This expense represents the actual charges paid by BSF for use of these services in connection with this Litigation.
 - e. **Court Costs:** \$1,024.25. These expenses were paid to the Court for filing fees and to firms or individuals who served subpoenas.
 - f. **Transcript Expenses:** \$44,078.05. BSF paid vendors such as Magna Legal Services for the transcription of various depositions.
 - g. **Document Reproduction:** \$4,430.72. BSF paid vendor SiteLogistix for various bulk scanning and printing tasks.
 - h. **eDiscovery Databases:** \$133,689.42. BSF has paid \$119,689.42 in expenses to date for hosting of eDiscovery through Rational, a modern, cloud-optimized

eDiscovery platform. BSF also requests \$14,000 in anticipated future costs to Rational from the date of this motion through the final approval hearing, which includes the costs of two months of storage of data (approximately \$5,000 per month) and the anticipated cost of migrating data to hard drives at the conclusion of the case (approximately \$4,000).

i. **Experts/Consultants:** \$357,632.50. Class Counsel retained the following experts and consultants and utilized their services throughout the Litigation:

- i. Jane Khodarkovsky—Ms. Khodarkovsky is a former prosecutor and sex-trafficking expert who provides consulting services related to anti-money laundering, human trafficking, and child exploitation. Ms. Khodarkovsky prepared expert reports in connection with class certification in this matter, reviewed many documents produced by Defendants, provided deposition testimony in May 2023, and provided valuable consulting services to BSF in connection with this case.
- ii. Ross Delston—Mr. Delston is a Certified Anti-Money Laundering Specialist who provides expert testimony and consulting on Bank Secrecy Act and Anti-Money Laundering compliance issues. Mr. Delston began preparing an expert report in this matter, opining on whether Defendants facilitated Jeffrey Epstein’s criminal activities by failing to meet industry standards relating to anti-money laundering, and reviewed many documents produced by Defendants in doing so.
- iii. Marianne Demario—Ms. DeMario is a Certified Public Accountant who specializes in forensic accounting investigations, damages analyses, and

business valuations. Ms. Demario began preparing an expert report in this matter, providing an analysis of the amount of economic damages Class Representative suffered due to Defendants' conduct.

9. The expenses pertaining to this case are reflected in the books and records of BSF. These books and records are prepared from receipts, expense vouchers, check records, and other documents and are an accurate record of the expenses.

I declare under penalty of perjury that the foregoing is true and correct. Executed September 15, 2023, at New York, New York.

/s/ Sigrid S. McCawley_____
Sigrid S. McCawley